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April 3, 2024

VIA ECF

Honorable Taryn A. Merkl
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *Bartlett, et al. v. Société Générale de Banque au Liban S.A.L., et al.,*
Case No. 19-cv-007 (CBA) (TAM)**

Dear Judge Merkl:

We write on behalf of the Moving Defendants,¹ pursuant to this Court's order dated January 5, 2024, to provide a status report on the Letter Rogatory issued by the Court in August 2023 and to report on any response from Lebanese authorities.

On January 4, 2024, Moving Defendants submitted a status report, which explained that this Court's Letter Rogatory of July 15, 2023 had been delivered to the U.S. Department of State's Office of Legal Affairs on October 5, 2023. ECF 369. The letter had not yet reached Lebanon through official channels.

The Moving Defendants have now received a courtesy copy of a letter from Judge Henri Khoury, Lebanon's Minister of Justice, dated March 28, 2024.² The Minister's letter explains that the Letter Rogatory requesting international judicial assistance did not reach the Lebanese Ministry of Justice until February 2, 2024. The Minister's letter notes the "Ministry's heavy schedule under prevailing circumstances in the region and the country," as well as the Ministry's need to "engag[e] with various government agencies" before responding to the Letter Rogatory. The Minister of Justice

¹ Société Générale de Banque au Liban S.A.L.; Fransabank S.A.L.; MEAB Bank s.a.l.; Bank S.A.L.; Byblos Bank S.A.L.; Bank Audi S.A.L.; Bank of Beirut S.A.L.; LGB Bank s.a.l.; Banque Libano Française S.A.L.; Bank of Beirut and the Arab Countries S.A.L.; and Fenicia Bank S.A.L.

² We understand that the Minister's letter is being conveyed to this Court through official channels but it is not clear how long that process will take. Accordingly, we have attached a courtesy copy of the Minister's March 28 letter as **Exhibit A** hereto for this Court's awareness.



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states that, in light of all this, additional time is needed to respond, and he requests that the deadline for responding to the Letter Rogatory be extended by three months—from April 15, 2024 to July 15, 2024.

Given the reasonableness of the request from Lebanon’s Minister of Justice, and consistent with this Court’s order of June 8, 2023, the Moving Defendants intend to seek an extension of the current deadline for Lebanese authorities to respond to the Letter Rogatory. *See* ECF 328 (noting that “the Court will consider requests for extensions of time that are filed in accordance with the Court’s individual rules” if “Defendants determine that they have good cause to seek an extension,” and requiring that the application “include the Plaintiffs’ position”). The Moving Defendants have contacted Plaintiffs’ Counsel to solicit their position or to request an opportunity to meet and confer.

Respectfully submitted,

/s/ Samantha Chaifetz

Samantha Chaifetz

cc: All counsel of record via ECF